

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AD1 Urban Palm Bay, LLC, *et al.*,
Debtors.¹

Chapter 11

Case No. 23-10074 (KBO)

(Jointly Administered)

Ref. Dkt Nos. 622, 631, 671 & 687

**CERTIFICATION OF COUNSEL SUBMITTING CONSENSUAL ORDER GRANTING
HPS INVESTMENT PARTNERS, LLC’S MOTION TO CONVERT DEBTORS’
CHAPTER 11 CASES TO CASES UNDER CHAPTER 7 OF THE BANKRUPTCY CODE**

The undersigned hereby certifies as follows:

1. On September 25, 2023, HPS Investment Partners, LLC (“HPS”) filed a *Motion to Convert Debtors’ Chapter 11 Cases to Cases Under Chapter 7 of the Bankruptcy Code* [Dkt. No. 622] (the “Motion”).

2. On October 19, 2023, the Court held a hearing (the “Hearing”) on the Motion and, for the reasons set forth on the record, granted the Motion. At the conclusion of the Hearing, the Court instructed the parties to submit a revised proposed order memorializing the Court’s ruling under certification of counsel.

3. Thereafter, counsel to HPS, the Debtors, and the Office of the United States Trustee have conferred and consented to the entry of the revised form of conversion order attached hereto as **Exhibit A** (the “Revised Order”). A blackline comparison of the Revised Order marked against the latest version of the proposed form of order [Dkt. No. 687-1] is attached hereto as **Exhibit B**.

¹ The debtors in these Chapter 11 Cases, along with the last four digits of each debtor’s federal tax identification number, are: AD1 Celebration Hotels, LLC (7980); AD1 Daytona Hotels, LLC (7940); AD1 LBV1, LLC (1125); AD1 PB Airport Hotels, LLC (6855); AD1 SW Property Holdings, LLC (2507); AD1 Urban Palm Bay, LLC (3713); AD1 Urban Palm Bay Place, LLC (2385); AD1 Celebration Holdings, LLC (3363); AD1 Daytona Holdings, LLC (2761); AD1 LBV Hotels, LLC (7709); AD1 Palm Beach Airport Hotels, LLC (2187); AD1 Urban Strategy Palm Bay, LLC (9412); and AD1 Urban SW, LLC (6934) (collectively, the “Debtors”). The mailing address for each of the Debtors is 1955 Harrison Street, Suite 200, Hollywood, FL 33020.

WHEREFORE, HPS respectfully requests the Court enter the Revised Order without further notice or hearing. In accordance with the Court's electronic order processing procedures, a clean copy of the Revised Order will be uploaded to CM/ECF.

Dated: October 19, 2023
Wilmington, Delaware

Respectfully submitted,

By: /s/ Zhao Liu
Frederick B. Rosner (DE # 3995)
Scott J. Leonhardt (DE #4885)
Zhao (Ruby) Liu (DE #6436)
THE ROSNER LAW GROUP LLC
824 N. Market Street, Suite 810
Wilmington, DE 19801
rosner@teamrosner.com
leonhardt@teamrosner.com
liu@teamrosner.com

-and-

Daniel A. Fliman (admitted pro hac vice)
Daniel Ginsberg (admitted pro hac vice)
Emily Kuznick (admitted pro hac vice)
PAUL HASTINGS LLP
200 Park Avenue
New York, New York 10166
danfliman@paulhastings.com
danielginsberg@paulhastings.com
emilykuznick@paulhastings.com

Counsel to HPS Investment Partners, LLC